



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

July 22, 2018

Via ECF and By Hand

The Honorable Kimba M. Wood
United States District Judge
Southern District of New York
500 Pearl Street, Room 1910
New York, NY 10007

**Re: United States v. Gerald Seppala
16 Cr. 436 (KMW)**

Dear Judge Wood:

The Government submits this letter in order to address restitution with respect to the above-referenced defendant. The Government and defense counsel have consulted since the sentencing proceeding on July 17, 2018, and have reached agreement that \$987,500 represents the appropriate restitution figure attributable to the defendant. A proposed restitution order is annexed to this letter for the Court's consideration. This restitution order differs from the prior proposed order submitted by the Government in that two victims – Christine and Samer Alkoury -- are removed from the order. Based on discussion with defense counsel and further investigation by the Government, the Government has determined that the losses suffered by the Alkourys are not properly attributable to Mr. Seppala.

At the July 17, 2018, sentencing proceeding, the Court further inquired regarding a \$100,000 civil judgment that Mr. Busbice had obtained against the defendant. After consultation with defense counsel and counsel for Mr. Busbice, the Government has determined that Mr. Busbice has not collected on any of said judgment, and thus the \$500,000 restitution obligation to Mr. Busbice remains in full.

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In order to protect the privacy of victims, a redacted restitution order is being filed on ECF, and an unredacted order is being provided to the Court by-hand. The Government respectfully requests that only the redacted version of the restitution order be docketed by the Court.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

By:



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